

**NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP**

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January 5, 2017

**By Electronic Mail and First Class Mail**

Ms. Sheri L. Bianchin  
Remedial Project Manager  
Institutional Controls Coordinator  
U.S. Environmental Protection Agency Region 5  
77 West Jackson Boulevard (SR-6J)  
Chicago, IL 60604

**Re: NL Industries/Taracorp Superfund Site; Granite City, Illinois  
Consent Decree – Quarterly Progress Report 44 (October-December 2016)**

Dear Ms. Bianchin:

As required by the Consent Decree for the NL Industries/Taracorp Superfund Site (the “site”), two copies of this letter are submitted, on behalf of the NL Industries/Taracorp Superfund Site Group (“Group”), to provide the U.S. Environmental Protection Agency (“EPA”) with a quarterly progress report for the Supplemental Environmental Project (“SEP”), operation and maintenance, and other activities that were performed during the period from October-December 2016.

**1. Actions Taken During Previous Quarter to Comply with the Consent Decree:**

- **Residential Soil Remediation:** On October 5, 2016, the Group sent letters to advise the mayors of Granite City and Madison that the Group’s remedial contractor, Environmental Works, Inc. (“EWI”), planned to mobilize to the site on October 17, 2016 to complete the remaining residential soil remediation activities that were started, but not completed, in 2015. During the period from October-December 2016, EWI completed soil excavation and restoration activities on 16 residential properties on the Group’s behalf. Representatives of EWI and Illinois EPA performed a pre-final inspection of the remediated properties on December 21, 2016.
- **Contingency Measures:** During the October-December 2016 period, the Group and EPA continued to discuss the remaining contingency measures for the site. In November 2016, EWI performed visual canvassing, pursuant to Section 8.0 of the Updated Remedial Action Work Plan for Residential Soil Remediation and 1555 State Street Property Sidewalk Replacement, to identify residential properties where barriers have deteriorated or have been potentially removed such that soil below the barrier or potential barrier has become exposed due to land use changes or deterioration of the existing use. In addition, EWI initiated efforts to prepare a Visual Canvassing Report, the Group initiated efforts to prepare a letter to evaluate the results of the visual canvassing and to assess whether further action is necessary for the properties as part of the contingency measures program, and the Group initiated efforts to prepare a Contingency Measures Work Plan.

- **Institutional Controls:** At the request of EPA, the Group submitted an updated version of the Institutional Controls Work Plan to EPA on November 10, 2016 for review and approval.
- **SEP:** The Madison County Community Development (“MCCD”) continued to seek additional applicants for participation in the SEP. During the October-December 2016 period, MCCD accepted one property owner for participation in the SEP, performed one lead paint risk assessment, and signed one contract for lead abatement. For the project to date, mitigation and clearance testing have been performed and determined by MCCD to be complete at 126 properties located within the boundaries of the site. Based upon EPA's determination that the SEP completion date will not extend beyond March 8, 2017, the Group continued to prepare a SEP Completion Report.
- **Operation and Maintenance:** During the October-December 2016 period, the following operation and maintenance activities were performed at the site:

October 20	The Group's contractor, Munie Greencare Professionals (“Munie”), cut the vegetation on the main industrial site.
October 20	The Group's project coordinator received an email from Mr. John Birdsong, Granite City Sanitation Department, who acknowledged that the grass at the main industrial site was recently cut and to request that the Group also cut the grass in the easement area along the street of the 1555 State Street property next year. The Group's project coordinator sent an email to Mr. Birdsong to acknowledge receipt of his request.
November 11	Sent an email to Beelman Truck Co.'s representatives to advise them that an inspection of the Slough Road area would be performed as part of an operation and maintenance inspection on November 15.
November 15	The Group's project coordinator performed a semi-annual operation and maintenance inspection at the site.
November 18	The Group's project coordinator sent an email and letter to EPA to provide log sheets and photographs documenting the results of the semi-annual operation and maintenance inspection performed at the site on November 15, 2016.

- **Project Coordination:** During the October-December 2016 period, the Group's project coordinator communicated with the following parties regarding work at the site:

October 4	Issued SEP Quarterly Progress Report 15, prepared by MCCD, to EPA.
October 5	Submitted Quarterly Progress Report 43 to EPA.
October 5	Sent emails and letters to advise the mayors of Granite City and Madison that EWI planned to mobilize to the site on October 17, 2016 to complete the remaining residential soil remediation that was started but could not be completed in 2015.
October 7	Sent an email to EPA to provide EWI's preliminary remedial action schedule for residential soil remediation.
October 11-October 14	Communicated with EPA, Illinois EPA, and MCCD regarding soil remediation on the residential property at <b>non-responsive</b>

October 13	Sent an email to advise the Granite City Building and Zoning Administrator regarding the schedule for residential soil remediation.
October 14	Sent an email to EPA to confirm that the pre-construction/construction meeting conference call for residential soil remediation would be held on October 19, 2016.
October 14	Sent an email to EPA to provide an update on the status of residential soil remediation and to confirm that EWI planned to mobilize personnel, equipment, and supplies, etc. to the site on October 17, 2016 for residential soil remediation.
October 17	Spoke to the owner (the executor of the estate) of the residential property at <b>non-responsive</b> and received access for remediation.
October 19	Participated in a pre-construction/construction meeting conference call with EPA, Illinois EPA, and EWI.
October 20	Sent an email to EPA to provide notes summarizing the results of the October 19, 2016 pre-construction/construction meeting conference call for residential soil remediation.
October 25	Sent an email to EPA to provide Pace Analytical's laboratory data report from the analysis of the proposed backfill soil for residential property restoration activities.
October 28	Sent an email to EPA to provide Pace Analytical's laboratory data report from the remaining analyses of the proposed backfill soil for residential property restoration activities.
October 28	Received approval from EPA and Illinois EPA to use Topsoil Plus from St. Louis Composting for residential soil restoration activities at the site.
October 31	Sent an email to notify EPA that the owner of the residential property at <b>non-resp</b> denied access for residential soil remediation.
November 2	Sent an email to EPA to provide property owner contact information for the residential properties at <b>non-responsive</b> .
November 2	Sent emails to EPA and Illinois EPA regarding remediation of the back yard of the <b>non-responsive</b> .
November 3	Participated in a conference call with EPA, Illinois EPA, and EWI regarding remediation of the <b>non-responsive</b> .
November 3	Sent an email to EPA to provide information regarding soil remediation on the residential properties at <b>non-responsive</b> .
November 4	Sent a letter to the owner of the <b>non-responsive</b> to attempt to schedule remedial activities.
November 4	Participated in a conference call with EPA and EWI and discussed the status of residential soil remediation activities.
November 7	Spoke to EPA's project manager regarding the <b>non-responsive</b> and the agenda for the November 16, 2016 site visit/meeting.
November 7	Sent an email to EPA to provide notes summarizing the results of the November 4, 2016 conference call for residential soil remediation.

November 8	Sent emails to EPA's project manager to provide copies of the 2003/2004 and 2010 SEP Work Plans and SEP Work Plan approval letters.
November 8	Received a final version of EPA's March 23, 2011 approval letter of Section 8.0 of the Institutional Controls Work Plan pertaining to the revised SEP Work Plan.
November 8	Sent an email to EPA's project manager to provide a copy of the Group's September 28, 2016 letter to the owner of the non- property.
November 9	Spoke to EPA's project manager regarding remediation of the non- property.
November 10	Following EWI's unsuccessful efforts to obtain access from the owner of the non-responsive , spoke to the brother of the owner of the non- property and subsequently sent a letter to request access for soil remediation.
November 10	In response to a request from EPA, sent an email to EPA's project manager to provide a copy of the approved 2002 Operation and Maintenance Plan, along with information regarding submission schedules for a revised Operation and Maintenance Plan, Institutional Controls Work Plan, and Institutional Controls Monitoring Plan.
November 10	Sent an email to EPA to provide an update of efforts to obtain access from the new owner of the non- property.
November 10	Sent an email to EPA to provide the updated Institutional Controls Work Plan.
November 14	Received an email from EPA's project manager regarding EPA's discussion with the owner of the residential property at non- .
November 16	Met at the site with EPA and Illinois EPA and participated in a bi-weekly progress meeting for remedial activities (including contingency measures) and in EPA's annual site visit.
November 18	Sent an email to EPA to provide notes summarizing the results of the November 16, 2016 bi-weekly progress meeting regarding residential soil remediation.
November 18	Sent an email to EPA regarding the Group's efforts to prepare the Contingency Measures Work Plan and the schedule for submission of the work plan.
November 18	Sent an email to EPA and Illinois EPA to provide an update of remedial action issues related to the residential properties at non- and non- .
November 28	Participated in a conference call with representatives of EPA, DOJ, and the Group and discussed the status of residential soil remediation, payment of EPA's past costs, and related matters.
December 12	Sent an email to EPA's project manager to provide an update on the status of residential soil remediation activities at the site, including that backfilling of excavated areas on the residential properties would be completed on December 12 and that sod placement would continue as soon as sod is available from the sod farm (the sod farm's ability to provide sod had been delayed as a result of recent rainfall in the area).
December 16	Sent an email to advise EPA's project manager that sod installation, as part of residential soil remediation activities, was completed on December 15 and that EWI and Illinois EPA planned to perform the pre-final inspection associated with residential soil remediation activities on December 21.

December 19	Sent an email to EPA's project manager to confirm that, in response to requests from three residential property owners, several modifications were made to restoration activities on their properties.
December 21	Sent an email and letter to EPA's project manager to provide a copy of Johnson Controls, Inc.'s financial statements to satisfy the financial assurance requirements of the Consent Decree.
December 30	Sent an email to EPA's project manager in regard to the schedule for submission of the Visual Canvassing Report and Contingency Measures Work Plan.

2. **Summary of Data and/or Results of Sampling and Tests Received:**

- As indicated above, the Group's project coordinator submitted laboratory data to EPA and Illinois EPA from the analysis of soil that EWI proposed to use for backfilling excavated areas on residential properties. The Group subsequently received approval from EPA and Illinois EPA to use the soil (Topsoil Plus from St. Louis Composting) for restoration activities.

3. **Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Quarter:**

- As indicated above, the Group submitted an updated version of the Institutional Controls Work Plan to EPA on November 10, 2016.

4. **Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:**

- The Group will continue to perform operation and maintenance activities at the site.
- The Group and EWI will initiate efforts to prepare a report to document the completion of residential soil remediation activities at the site in 2015 and 2016. The final inspection for remediated residential properties will be held in spring 2017.
- At the present time, the Group expects to submit EWI's Visual Canvassing Report to EPA in January 2017. The Group also expects to submit a letter to EPA in January 2017 to evaluate the results of the visual canvassing and to assess the properties that qualify for potential inclusion as part of the contingency measures program.
- The Group expects to submit the Contingency Measures Work Plan to EPA in January 2017.
- The Group will address comments, if any are received from EPA, on the Institutional Controls Work Plan. Upon receipt of EPA's approval, the Group will initiate efforts to implement the remaining components of the Institutional Controls Work Plan.
- The Group and MCCD will continue to prepare a SEP Completion Report, which will be submitted to EPA upon completion. MCCD will continue to implement the SEP and seek

additional participants in the SEP. The Group will provide copies of MCCD's progress reports to EPA on a quarterly basis.

- The Group will address comments, if any are received from EPA, in regard to the Five-Year Review Groundwater Monitoring Report, which was submitted to EPA on August 11, 2014 to summarize the results of the April 2014 groundwater monitoring event.
- The Group will address comments, if any are received from EPA, in regard to: (1) the Soil Sampling and Analysis Report, which was submitted to EPA in January 2014 to document the results from soil sampling activities at 73 residential properties in April – May 2011, September 2012, June 2013, and October 2013; (2) the Soil Sampling and Analysis Report Addendum, which was submitted to EPA in December 2015 to document the results of soil sampling performed on three residential properties (non-responsive and non-) in June 2015 and one residential property (non-responsive) in November 2015; and (3) the Soil Sampling and Analysis Report Addendum No. 2, which was submitted to EPA in September 2016 to document the results of soil sampling activities performed on three residential properties (non-responsive and non-) in August 2016.

5. **Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:**

- As previously reported, the level of public participation in the SEP has been less than originally anticipated by the MCCD. The MCCD will continue efforts to attempt to obtain additional participation. The Group will continue to advise EPA regarding MCCD's efforts and schedule.

6. **Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:**

- Not applicable for this reporting period.

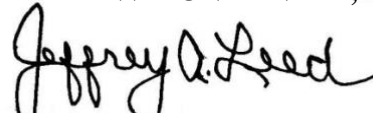
7. **Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:**

- As indicated above, the MCCD is continuing to attempt to encourage other homeowners to participate in the SEP.

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

LEED ENVIRONMENTAL, INC.



Jeffrey A. Leed  
Project Coordinator

Ms. Sheri Bianchin

January 5, 2017

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cc: Nicole Wood-Chi, Esq. – U.S. Environmental Protection Agency (by electronic mail)  
Christopher Grubb, Esq. – U.S. Environmental Protection Agency (by electronic mail)  
Ms. Erin Rednour - Illinois EPA (by electronic mail and first class mail)  
Mr. Tom Miller – Illinois EPA (by electronic mail)  
Technical Committee, NL Industries/Taracorp Superfund Site Group (by electronic mail)